

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER DISASTER	:	21 MC 100 (AKH)
SITE LITIGATION	:	(All Cases)
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IN RE WORLD TRADE CENTER LOWER	:	21 MC 102 (AKH)
MANHATTAN DISASTER SITE LITIGATION	:	(All Cases)
-----X		
IN RE COMBINED WORLD TRADE CENTER	:	21 MC 103 (AKH)
AND LOWER MANHATTAN DISASTER SITE	:	(All Cases)
LITIGATION (straddler plaintiffs)	:	
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**NOTICE OF MOTION TO DISMISS CERTAIN
PLAINTIFFS' CLAIMS**

PLEASE TAKE NOTICE that on a day to be determined by this Court, Plaintiffs' Counsel, Worby Groner Edelman & Napoli Bern, LLP, shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York located at 500 Pearl Street, New York, New York, Room 14-D for Order seeking the dismissal of certain plaintiffs' claims against all defendants with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(2).

Dated: New York, New York
March 1, 2012

/s/ Christopher R. LoPalo
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